

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

William Gardner

Case No.

2:21-mj-30220

Judge: Unassigned,

Filed: 05-11-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 3, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 11, 2021

City and state: Detroit, Michigan



Complainant's signature

Task Force Agent Jacklyn Kocis-Maniaci

Printed name and title



Judge's signature

Hon. Patrici T. Morris, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics that resulted in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that William GARDNER (DOB xx/xx/1990) has violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm, and does not

contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On April 3, 2021, Detroit Police Department (DPD) officers were on routine patrol when they observed GARDNER with a high-capacity magazine sticking out of his waistband. DPD officers conducted a U-turn. Officers observed GARDNER remove the handgun from his waistband and discard it under a vehicle.

5. DPD officers recovered the handgun from underneath the rear passenger tire of a Ford Taurus. GARDNER was arrested.

6. The recovered handgun was a Glock, model 19, 9mm caliber, loaded with twenty eight live rounds of ammunition.

7. On April 4, 2021, a computerized criminal history check showed that GARDNER has the following felony convictions:

- a. 2013- attempt-felony controlled substance,
delivery/manufacturing, Detroit, Michigan;
- b. 2014-possession with intent, heroin, Pittsburgh,
Pennsylvania; and
- c. 2015-felony home invasion 1, Detroit, Michigan.

8. On April 21, 2021, Special Agent Jimmie Pharr advised, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

9. Probable cause exists that William GARDNER, a convicted felon, did knowingly possess a firearm and ammunition, which had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).



Jaclyn Kocis-Maniaci, Task Force Officer,
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn and subscribed to before me in my
presence and/or by reliable electronic means.



HON. PATRICIA T. MORRIS
UNITED STATES MAGISTRATE JUDGE